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editing, browsing and hyperlink navigation (specification at page 5, lines 21 – 30). An ordinary television set is used as a display device (108 of FIG. 1).

Claims 7 – 9 define multiple keystroke sequences used for data entry from a reduced keyset input device (FIG. 2 and specification from page 7, line 20 through page 8, line 11). Claims 12 and 13 define use of an infrared coupled hand-held device for data entry (102 of FIG. 1).

Claims 16 – 20 define a voice-to-text/control interface for creating a keystroke sequence for use with the system of claim 1 (FIG. 13).

Grounds of Rejection

1. Claims 1 – 6, 10, 11, 14 and 15 are rejected under 35 USC 103(a) as being unpatentable over De Boor et al. (US 6,675,204 B2) in view of Krueger et al. (US 6,098,086).

2. Claims 7 – 9, 12 and 13 are rejected under 35 USC 103(a) as being unpatentable over De Boor (US 6,675,204 B2) in view of Krueger et al. (US 6,098,086) as applied to claims 1 – 6, 10, 11, 14 and 15 above, and further in view of Mankovitz (US 5,949,492).

3. Claims 16 – 20 are rejected under 35 USC 103(a) as being unpatentable over De Boor et al. (US 6,675,204 B2) in view of Krueger et al. (US 6,098,086) as applied to claims 1 – 6, 10, 11, 14 and 15 above, and further in view of Yablon (US 5,764,731).

Remarks:

A. Claims 1 – 6, 10, 11, 14 and 15 are patentable over DeBoor et al. (US 6,675,204) in view of Krueger et al. (US 6,098,086) because the examiner fails to establish a *prima facie* case for obviousness under 35 USC 103(a) in that the proposed modification renders the invention of the primary reference unsatisfactory for its intended purpose (MPEP §2143.01 subsection V).

MPEP section 2143.01, subsection V (Rev. 5, Aug. 2006) states that "[if the] proposed modification would render the prior art invention unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification."

The applicants' claim 1 defines a system for text entry, text editing, and hyperlink navigation. The claim is to a combination of (1) a reduced keyset keystroke sequence and (2) hardware elements that utilize such a sequence to permit a user to input and edit text, and to browse and navigate system stored user display screens. ***Results are displayed on an ordinary television set.*** The appellants' FIG. 11 best illustrates claim 1.

The primary reference, DeBoor et al., devotes nearly 60 columns and 32 drawing sheets to instructing persons of ordinary skill in how to extend HTML to permit World Wide Web browsing and document manipulation to be achieved within a wireless communication device ("wireless communication device" 100, DeBoor et al. FIG. 1). A "suitable device" is the Nokia 6100™ (DeBoor et al., col. 8, lines 47 – 50). The primary reference contemplates a wireless communication device having a small screen (DeBoor et al. Abstract, Summary of the Invention) of limited resolution:

> "Unlike desktop and notebook computers, wireless communication devices have a form factor which requires a very small screen display size. . . about 3 – 8% of the size of the desktop or notebook screen." (DeBoor et al., col. 1, line 64 – col. 2, line 5).
>
> "Accordingly, it is desirable to provide a software architecture for the [man-machine interface] of a wireless communication device that enables the customization and use of user interface with Web content accounting for the limited screen resolution and input functionality of the wireless communications device." (col. 2, lines 29 – 33).
>
> "The screen display 136 [FIG. 1] is a bitmapped LCD or similar display device. The screen display 136 is typically of very limited resolution, for example about 90x60 to 120x120 pixels (at about 0.28 mm dot pitch) as would be appropriate for a compact, portable, hand-held electronic device. It is anticipated that advances in display technology will result in screen displays 136 of significantly higher resolution, but even so, the ergonomic and form factor requirements of wireless communication devices will result in screen displays that are relatively small (e.g., between 25x25 mm and 80x120 mm) as compared to the screen displays of notebook and desktop

computers, and as a result will not display content designed for such larger screen displays in the exactly the same manner. The present invention is adapted to increase the ease of use of such screen displays when displaying Web content." (col. 9, lines 9 – 24).

At no time during the approximately 60 columns of the primary reference is there a suggestion that the wireless communication device 100 should be modified to provide a larger display screen 136. In fact, much of the teaching of the reference is devoted to the extended HTML that implements, among other things, the preferred man-machine interface employing the small display screen 136. There does not appear to be any motivation for modifying the invention of the primary reference to use a larger display screen, let alone an ordinary television set. Everything in the primary reference related to display teaches away from a larger display screen.

Claim 2 adds a reduced keyset user input device to the system (102 of FIG. 1; see also FIG. 3). Claim 14 identifies the input device as a standard wireless telephone, suggesting that the telephone keypad is the source of the reduced keyset keystroke sequence. Claim 15 indicates that the keystroke sequence receiver is adapted for receiving a standard wireless telephone transmission, reinforcing the idea that the keystroke sequence originates in a part of the system separate from the hardware elements of claim 1.

Claim 4 provides a communication network means for accessing the stored user display screens via the browser, which is part of the claim 1 apparatus. Thus, the user display screens are located within the system but beyond the claim 1 hardware elements. And the connection between the claim 1 apparatus and the user display screens is via a network connection (FIG. 1), suggesting these screens are remotely located. The appellants' FIG. 11 illustrates this arrangement.

Claim 5 gives a name to the hardware elements of claim 1. Claim 5 defines that name as an Internet appliance (1104 of FIG. 11) which includes the keystroke receiver 1106, the sequence parser 1108, the browser 1110, and a converter 1118 for output to the

ordinary television set. Thus, all the elements of claim 1, except for the keystroke sequence, are gathered together into something called an Internet appliance (the set top box 104 of FIG. 1).

It appears unlikely that a person having an ordinary level of skill in the art would be motivated to modify the wireless communication platform of the DeBoor et al. disclosure to use a standard television set for display for what is essentially a hand-held device.

The reason claim 1 has the structure it does is that the Internet appliance is part of a system installed in hotel rooms in which a hand-held TV remote or cell phone is typically used to control a set top box (the Internet appliance—specification from top of page 2 through page 4, line 7 and in the disclosures listed in the first paragraph of the specification and incorporated by reference at page 5, lines 5 and 6). The box uses the television set for display, and accesses other elements of the system via the Internet (for example, the user display screens, but also email, standard web pages, etc.) and permits the user to use the hand-held device and to edit and create text, send/receive email, browse the Internet, and display each of these things on the hotel room's television set.

The wireless communication device platform (and small screen) of the DeBoor et al. reference does not lend itself to this application. It's true that it could be modified to create the claim 1 structure (element 1104 of FIG. 11), but that is a significant modification, because in addition to adding an output for a standard television set it would be necessary to separate the reduced keyset keypad from the remaining parts of the system (as does the applicants' claim 1) and provide communications between the two parts. There would not appear to be sufficient motivation to undertake such modifications ("Fact that references can be combined or modified is not sufficient to establish *prima facie* obviousness, MPEP § 2143.01, subsection III). Everything in DeBoor et al. teaches how to use a wireless communication device (recall that a "suitable device" is the Nokia 6100™) to be both phone and Web access device.

The appellants believe that the modifications proposed by the examiner would render the DeBoor et al. wireless communication device unsatisfactory for its intended purpose. The examiner has failed to establish a *prima facie* case of obviousness, and claims 1 – 6, 10, 11, 14 and 15 are patentable over the cited references.

B. Claims 7 – 9, 12 and 13 are patentable over De Boor (US 6,675,204 B2) in view of Krueger et al. (US 6,098,086) as applied to claims 1 – 6, 10, 11, 14 and 15 above, and further in view of Mankovitz (US 5,949,492).

The appellants do not advance the position that the multiple-keystroke sequences of claims 7 – 9, nor the use of an infrared coupled hand-held remote unit to create a keystroke sequence, as in claims 12 and 13, are original or worthy of patent protection by themselves. Rather, claims 7 – 9, 12 and 13 depend directly or indirectly from claims 1, 2 and 6, which the appellants have argued above are patentable.

Therefore, the appellants believe claims 7 – 9, 12 and 13 are patentable over the cited references.

C. Claims 16 – 20 are patentable over De Boor et al. (US 6,675,204 B2) in view of Krueger et al. (US 6,098,086) as applied to claims 1 – 6, 10, 11, 14 and 15 above, and further in view of Yablon (US 5,764,731).

The Yablon reference teaches voice-to-text/control input. Claims 16 – 20 define the source of the keystroke sequence of claim 1 as being derived from a voice-to-text/control circuit (voice recognition means). The appellants believe claim 1 is patentable over the cited references, as they argue above. Claims 16 – 20 depend, directly or indirectly from claim 1.

Therefore, the appellants believe claims 16 – 20 are patentable over the cited references.

Conclusion

The applicants have considered the prior art cited and not relied upon, and have carefully considered the examiner's remarks. In response, the applicants have traversed the rejections of all claims and request that the rejections be withdrawn and their claims allowed.

Respectfully submitted,

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